

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DINA CAPITANI

Plaintiff

v.

**WORLD OF MINIATURE BEARS, INC.,
individually, and d/b/a MINIBEARGEMS,
and MINI BEAR GEMS, and
MINIBEARSGEMS & GIFTS, INC.,
individually, and d/b/a MINIBEARGEMS
and MINI BEAR GEMS**

Defendants.

Civil Action No. 3:19-cv-00120

**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE EVIDENCE OF JUDGMENT
AGAINST GEOFFREY AND CATHY ROEBUCK**

COMES NOW, the Defendants, by and through counsel, and hereby move this Court to prohibit Plaintiff from making any reference to or introducing any evidence related to the judgment obtained by Plaintiff against Geoffrey and Cathy Roebuck. Such judgment has no relevance in concerning whether the items obtained by Defendant were received under license from the first (and only) production run of wagging tail dog clocks. Pursuant to Federal Rules of Evidence 401, 402, and 403 and for the reasons further explained and set forth in the accompanying Memorandum of Law, Defendants World of Miniature Bears, Inc. and MiniBears Gems & Gifts, Inc. requests that the Court grant their motion to exclude testimony on the default judgment obtained against Geoffrey and Cathy Roebuck.

Respectfully submitted,

/s/ Desireé J.C. Goff
John A. Beam, III (BPR #11796)
Desireé J.C. Goff (BPR # 31136)
Equitus Law Alliance, PLLC
709 Taylor Street
P.O. Box 280240
Nashville, Tennessee 37228
Telephone: (615) 251-3131
Facsimile: (615) 252-6404
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2020, I electronically filed the Motion in Limine to Exclude Evidence of Judgment against Geoffrey and Cathy Roebuck with the Clerk of this Court using the CM/ECF system which will automatically send email notification of such filing to the following parties who are CM/ECF participants:

Autumn L. Gentry, Esq.
Dickinson Wright, PLLC
424 Church Street, Suite 800
Nashville, Tennessee 37219
Attorney for Plaintiff Capitani

/s/ Desireé Goff
Desireé Goff